

## Scope

This Privacy Statement describes the way in which Sho-Me Technologies, L.L.C. (SMT) uses and protects the information collected about customers and users of the SMT network. SMT limits the information collected to what is needed for conducting business, including any information that may need to be provided to third parties which SMT may engage to complete any service provided to the customer and/or user. SMT retains any information collected as long as necessary for SMT to comply with business, tax and legal requirements. This retention period could and probably will extend beyond the period of a customer's contracted term for service.

## Types of Information Collected

- 1) Personal Information we collect:
  - a. Customer Contact Information including but not limited to:
    - i. Name
    - ii. Title
    - iii. Contact Type (Primary, Billing, Technical, Site, Etc.)
    - iv. Phone number
    - v. Email address
    - vi. Mailing address
- 2) Financial Information we collect:
  - a. Customer Billing Information including but not limited to:
    - i. Financial/Banking Information
      1. Account Numbers
      2. Routing Numbers
      3. No credit card information is retained
    - ii. Tax Exempt Status
    - iii. Exemptions from Missouri Universal Service Fund and Federal Universal Service Fund
    - iv. Credit References
- 3) Customer Proprietary Network Information (CPNI) we collect:
  - a. Information that relates to the quantity, technical configuration, type, destination, location, amount of use, network utilization and traffic pattern of services provided by SMT.
  - b. Network to Network Interface Equipment type
    - i. May include MAC and/or IP address(es)
      1. SMT will not be responsible for inadvertently obtaining MAC and/or IP address which reside on the LAN side of the point of demarcation if the customer connects a Layer 2 device to the SMT network
    - ii. Site location addresses and directions
    - iii. Site after hours entrance procedures and entrance codes where supplied
    - iv. Third party circuit identification numbers, if applicable

### How this information is collected

- 1) Provided to SMT personnel by customer either in person, via telephone or electronically
- 2) Provided to SMT personnel by a third party either in person, via telephone or electronically
- 3) Obtained during circuit testing/monitoring
- 4) Obtained from other sources such as credit agencies

### How this information is used

- 1) To provide and maintain the products and services provided to the customer or to promote new products and services to the customer which are offered by SMT.
- 2) To communicate with the customer including but not limited to:
  - a. General Customer Support
  - b. Billing and/or delinquency inquiries
  - c. Notice of Field Activity (NOFA) announcements
  - d. Preemptive trouble reporting
  - e. Replies/updates to new or existing trouble tickets
  - f. Delivery of Network Health Reports
  - g. Action regarding illegal activities, violations of Terms and Conditions or Acceptable Use Policies
- 3) As necessary to perform business duties required in providing service for customer

### Information Sharing

- 1) SMT does not sell any information collected to third parties.
- 2) SMT may share this information with its parent company, Sho-Me Power Electric Cooperative, which is subject to the terms of this Statement.
- 3) SMT will only share customer information with third parties who perform services on our behalf, and only that information which is necessary to provide those services for the customer.
- 4) SMT may share customer information with third parties under nonstandard situations:
  - a. Responding to emergencies
  - b. Assist in collecting payment
  - c. Complying, when required by law, with:
    - i. Court or Administrative Orders
    - ii. Civil or Criminal Investigations and/or Subpoenas
    - iii. Warrants from law enforcement agencies
    - iv. Federal or State Requirements
    - v. Mandatory Government Audits
    - vi. Grand Jury Investigations
    - vii. Reporting required by the National Center of Missing and Exploited Children
    - viii. Any appropriate law enforcement agency when SMT believes the disclosure is necessary to protect a person, property or the public from harm
  - d. Enforcing property rights of SMT
  - e. Obtaining payment for services

### Voice and Data Protection and Security

- 1) SMT employees are bound by policies and procedures requiring them to protect confidential information obtained while on-duty and restricts them from disclosing this information inside or outside of SMT.
- 2) SMT employees must abide by all state and federal laws and regulations in the performance of their duties.
- 3) SMT uses security techniques designed to protect customer information from unauthorized access including firewalls and access control devices such as video surveillance, monitored door alarms, card key entry and all access control is monitored 24x7x365 by the SMT Network Operations Center.
- 4) SMT operates several Ethernet transport systems across Missouri. Customer services provided by these transport systems are segregated using virtual LAN id's (VLAN) or virtual private LAN service (VPLS) standards. Each customer/service has a unique identification (i.e., VLAN and/or VPLS) within the transport system(s). The identification is assigned to system resources to create the private and secure bandwidth/service.
- 5) The only time any customer data which traverses the SMT fiber optic network will be obtained is when trouble shooting a working circuit. Ethernet packets will be monitored via the Ethernet monitoring port and the MAC address and IP address portion of the packet will be analyzed. The data portion of the packet will not be analyzed or interrogated and all packets are discarded after testing.